

SECOND DECLARATION OF DANIEL HOLLER

I, Daniel Holler, pursuant to 28 U.S.C. 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration.
2. I am currently serving as the Deputy Chief of Staff to the Secretary of State. I have served as a policymaker at the Department of State since shortly after President Trump's inauguration in January 2025. Previously, I served as a Deputy Chief of Staff in the United States Senate and as a founding member of a leading advocacy and public policy research institute.
3. I am aware that the instant lawsuit has been filed on behalf of the named plaintiffs against President Donald J. Trump and several federal agencies alleging that proposed administrative actions were harmful to their members. I previously submitted a declaration in this litigation on June 9, 2025. ECF No. 155-2 (Holler Decl.). I provide this declaration based on my personal knowledge and experience, reasonable inquiry, and information obtained from other State Department employees.
4. My earlier declaration concerned an ongoing effort at the State Department with the goal of reforming the Department's operations and footprint to better reflect the Administration's diplomatic priorities and the needs of modern diplomacy. In that prior declaration, I provided a detailed timeline of the consideration of these matters by the Secretary of State, Marco Rubio, and a small group of advisers who were assisting the Secretary.

5. Overall, my declaration explained that this reorganization was directed by Secretary Rubio and intended to address foreign policy needs—not to respond to any EO or government-wide edict.
6. I understand Plaintiffs have filed a response to my June 9, 2025 declaration with the Court which includes various State Department materials. ECF No. 160. I have reviewed those materials, which include:
 - a. a June 10, 2025 letter to Secretary Rubio from U.S. Representative Lois Frankel, which quotes State’s May 29, 2025 “spend plan” for State’s fiscal year 2025 budget, which was submitted to congressional committees (ECF No. 160-1);
 - b. excerpts from State’s May 29, 2025 Congressional Budget Justification (ECF 160-1);
 - c. an April 27, 2025, transcript of a “Meet the Press” interview of Secretary Rubio (ECF No. 160-2);
 - d. a February 21, 2025 email, from an unnamed State Department employee to Executive Offices with the subject line “Subject: Action Request - EO re: DOGE Workforce Optimization.” (ECF No. 160-2); and
 - e. an April 24, 2025 email, from an unnamed State Department Human Resources Officer to employees of the State Department’s Counter Foreign Information Manipulation and Interference (R/FIMI) (ECF No. 160-2).

These materials contain references to Executive Order 14210, which is the subject of the Court’s preliminary injunction order.

7. Unfortunately, some of these materials were not properly vetted within the State Department, and as a result, incorrectly describe the nature of the agency's ongoing reorganization efforts. Specifically, items (a) and (b) (Exhibits A and B to the Leonard Declaration, ECF No. 160-1), contain references to EO 14210 in connection with the State Department's reorganization effort. Those documents should not have contained the phrase "pursuant to [EO 14210]." That statement is incorrect because State's ongoing reorganization was directed by Secretary Rubio and intended to address foreign policy needs—and as documented in my previous declaration, underway prior to any EO or government-wide edict.
8. The materials were prepared by the State Department's Bureau of Legislative Affairs, and were not sufficiently reviewed by State leadership, including the State leadership overseeing the ongoing reorganization. I have advised the bureau of the error, and we will be providing our Congressional committees with a corrected version of our Budget Justification.
9. I also address the remaining exhibits attached to Plaintiffs' reply.
 - a. Exhibit A to the Hunter Declaration, ECF No. 160-2, is a transcript of an April 27, 2025 interview with Secretary Rubio on "Meet the Press." The Secretary's statements indicate that the President empowered State to do a reorganization, but the Secretary did not say that the reorganization was directed by the President.
 - b. Exhibit B to the Hunter Declaration, ECF No. 160-2, is a data call to Department offices for information needed for the State Department to submit its Agency RIF and Reorganization Plan (AARP) to the Office of Management and Budget (OMB). As I explained before, "the Department's AARP submissions did not

include any specific elements of the ongoing reorganization planning with these intergovernmental parties.” Holler Decl., Para. 13. As emphasized in my earlier declaration, the reorganization plan was already being discussed among a small group of advisors to Secretary Rubio.

- c. Exhibit C to the Hunter Declaration, ECF No. 160-2, is an April 24, 2025 email from an unnamed person in State to an unnamed recipient. As I noted previously, the Reduction-in-Force (RIF) for the Counter Foreign Information Manipulation and Interference (R/FIMI) was a separate action that was not announced or actioned with the broader Department reorganization. I do not know whom in the State Department sent the email in Exhibit C, but that language was not vetted by myself or others in the Secretary’s office who were working on the broader reorganization.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 13, 2025, at Washington, D.C.

/s/ Daniel Holler

Daniel Holler